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# EXHIBIT 3.1

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

VIDEOSHARE, LLC,  Plaintiff,  v.  GOOGLE LLC and YOUTUBE, LLC,  Defendants.	CIVIL ACTION NO. 6:19-CV-00663-ADA  JURY TRIAL DEMANDED
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**PLAINTIFF'S OBJECTIONS TO DEFENDANTS' COUNTER-DESIGNATIONS TO  
PLAINTIFF'S DEPOSITION DESIGNATIONS**

Plaintiff VideoShare, LLC submits these objections to Defendants' counter-designations to Plaintiff VideoShare, LLC's deposition designations.

1. Guillaume Boissiere – 06/21/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
14:9-10			
25:19-22		25:23-25, 26:4-25, 27:1-3	
31:2-3	MIL		
31:6-16	MIL		
31:18	MIL		
31:21-25	MIL		
32:14	MIL		
32:17-25	MIL		
33:3-7	MIL		
38:15-18			
38:20-39:7		37:19-38:13	
52:4-9			
52:14-23			
52:25			

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
53:2-3			
53:8-9			
53:11-17	701, LC		
55:16-23			
56:1-3			
56:15-20	IIOC		
57:1-19			
60:13-61:23			
62:2-6			
62:10-17			
62:19-22			
63:1-17			
64:9-11			
64:14-65:24	DI, NR	64:12-13	
66:13	V, ML, 401/402, 403	66:9-12	
66:16-67:15	V, ML, 401/402, 403	66:9-12	
68:25-69:2	DI, C	69:5-6	Improper counter-designation; No answer designated.
69:17-19			
69:22-70:3			
72:20-21			
72:24-73:5			
79:3-5			
79:9-17			
82:16-85:7	IIOC		
125:8-11			
125:13-126:2		126:4-23	
129:14-16			
129:19-130:1		131:8-11, 131:13-15	
134:7-10	602, NR		

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
134:14-23	602, NR	134:25-135:3, 135:6-11, 135:13-16, 135:19-25, 136:2-5, 136:8-10	402, 602
143:25-144:4			
147:20-148:9			
180:25-181:4	NR		
181:6-184:10	NR		
184:22-23			
185:1-13		184:11-12, 184:15-20	602
243:3-5	602		
243:8-18	602	241:16-17, 241:19-242:11, 242:15-243:1	Non-responsive
248:1-11	602		
248:14-15	602		
282:25-283:9	104a, 602, 702, LC		

2. Randall Cook – 06/25/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
6:12-15			
11:23-12:11		12:12-16	
22:25-23:3	V		
23:6	V	21:24-22:2, 22:6-19, 22:22-23	
37:10-16		36:21-37:2	
38:17-21			
41:4-17	V		
47:20-21			
47:24-48:2			
48:10-18		48:4-7	
50:16-20		48:19-49:23	
51:5-12		49:14-23	

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
53:3-6	104a, V, LC	52:15-53:2	
54:25-55:1	104a, V, 602		
55:4-10	104a, V, 602		
55:12			
63:5-15	104a, V, 602	55:19-25, 56:1-6	
64:19-65:9		63:16-25, 64:1-5	
73:2-12		72:23-25, 73:1	
81:16-23		79:4-11	
93:5-13		93:14-15	
102:13-22			
104:6-8			
104:10-15			
105:25-106:6	MT		
106:9-12			
113:8-10			
114:5-9	30(b)(6)		
114:11-13	30(b)(6)		
115:13-15			
117:4-5		116:24-25, 117:1-3	

3. Chris Dodge – 06/18/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
10:10-11			
11:4-12		10:23-25, 11:1-3	
13:11-12			
13:19-20			
14:4-14		14:15-23	
22:9-10			
22:13-23:11			

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
27:11			
27:14-25	MIL	28:2-5, 28:8-22	701
28:24-29:10		28:2-5, 28:8-22	701
34:19-22			
34:24-35:3		31:9-18, 35:5:14, 35:17-23	
36:19			
36:23-37:7			
39:11-40:9	IIOC,		
40:11-17			
52:24-53:19			
54:1-55:10		55:11-56:11	
72:9-17			
73:4-15			
74:5-6			
74:8-11		74:13-14, 74:16, 75:2-3; 75:5-8	602
76:13-18			
76:20-77:5			
81:10-11			
81:13-82:21		80:11-14, 80:16-19, 80:21-81:9	602
82:23-83:1			
89:17-19			
89:21-90:14		89:3-6, 89:8-16, 90:15-16, 90:19-22	602
99:12-16			
99:18-24			
Errata 99:20			
100:1-5			
109:24-110:4		109:15-23	

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
113:1-3			
113:5-9		112:14-16, 112:20-23	
115:23-116:5	104a	114:2-8, 116:6-117:1,	
121:8-16			
Errata 121:11-12			
127:7-12		126:15-17, 126:19-21, 126:23-25, 127:3-6	
127:14-22			
127:24-128:2			
139:18-140:3		138:22-139:1	
167:23-24			
168:2-12			
168:21-23			
168:25-169:6			
169:14-16			
169:19-24			
172:25-173:2	NR, LC, 701, 104a		
173:4-10	NR, LC, 701, 104a		
179:11-180:11			
181:2-15			
Errata 181:9-15	104a, ML, 611c, LC, DI	181:2-15	
Errata 183:18-22	104a, ML, 611c, LC, DI	183:14-15, 183:18-22, 184:2-4, 184:7-12	701
223:12-18	L, ML, MT		
Errata 223:14	104a, 611c		
224:1-2	611c, 608		
224:4-9	611c, 608, 403, 104a, 602		
224:12-225:11	611c, 608, 403, 104a, 602		
225:14-16	MT, 611c		

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
225:19-25			
226:3-12	602, 611c, 104a		
226:15-22	602, 104a, 611c		
226:24-228:5	611c, IIOC, 403, 602, 608		
228:8-14	611c, ML, MT, 602, 608, LC		
228:16-25	611c, MT, ML, 602, 608, LC		
229:2-7	611c, MT, ML, 602, 608, LC		
229:9-11	611c, MT, ML, 602, 608, LC		
231:1-233:23	LC, 702, 104a, 611c		
234:1-5	LC, 702, 104a, 611c		

4. Thierry Foucu – 06/03/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
7:16-19			
22:13-21			
38:22-39:3			
40:12-24	30(b)(6), 104a, 602		
41:2-3	30(b)(6), 104a, 602		
41:5-6	30(b)(6), 104a, 602		
41:8-13	30(b)(6), 104a, 602		
42:2-15	30(b)(6)		
42:18-21	30(b)(6)		
42:23-43:1	30(b)(6)	43:4-9, 43:13-19	
43:24-25	30(b)(6)	43:21-23	
44:2-5	30(b)(6)		
44:11-15	30(b)(6)		

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
44:17-18	30(b)(6)		
51:13-20		50:25-51:3	402, 403
55:25-57:23			
68:22-69:3	IIOC,		
69:6-10			
70:21-71:2		70:1-20	
71:20-22		71:3-19	402, 403
71:25-72:17	IH, AF, MT		
72:21-73:7	IH, AF, MT		
73:11-13	IH, AF, MT		
74:8-14			
74:17-25			
81:1-22	30(b)(6)	80:5-17	
85:1-14		85:15-19	
86:16-20		86:3-6, 86:21-23	
93:6-16		92:25-93:5	
96:3-10			
103:23-24	30(b)(6)	103:9, 103:12-17, 103:20-21	
104:1-18	30(b)(6)		
104:20-105:2	30(b)(6)		
105:4-6	30(b)(6)		
105:22-106:2		105:8-21	
117:11-118:7			
123:1-2	30(b)(6)		
123:5-9	30(b)(6)		
123:12-18	30(b)(6)		
123:21-23	30(b)(6)		
132:16-17	30(b)(6), 602, IH		
132:20-133:3	30(b)(6), 602, IH		

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
133:6-9	30(b)(6), 602, IH		
140:12-21	30(b)(6)	139:25-140:2, 140:6-10	

## 5. Patrick Franzen – 06/17/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
10:7-11:9			
26:10-14	MT, ML	23:14-25, 24:21-23, 25:1-6, 25:10-26:1	602, 802 (25:25-26:1)
26:17-27:7	MT, ML, LC, 104a, 401/402, 403	18:11-20	602
30:10-18		29:22-30:9	
32:2-12		32:13-33:2	602
33:12-35:13		35:14-36:3	602
39:12-41:2		41:3-7	602
41:8-44:3			

## 6. Benjamin Hulse – 06/01/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
6:15-18			
24:3-6			
31:7-11	V		
32:3-14	30(b)(6), 602	31:16-23	
32:17-21	30(b)(6)		
55:3-8		52:19-55:2	402, 403
58:10-59:16		61:3-13, 61:17-22	Improper counter-designation
80:15-19	MT, 30(b)(6)		
80:22-81:2	30(b)(6)	76:15-17, 76:20-77:1, 77:4-8	

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
81:5-9	30(b)(6)		
81:12-14	30(b)(6)		
85:15-86:4		85:5-10, 85:13-14	
87:24-25	30(b)(6)	87:10-12, 87:15-20, 87:22-23	
88:2-3	30(b)(6)		
91:21-92:2		90:17-91:20	
93:10-18	IH		
93:21-94:4	IH		
96:1-25	IH		
97:8-10			
97:12-18		97:1-7	
108:19-23		107:8-20, 108:6-18	
115:13-116:21		114:3-6, 114:18-24, 116:22-117:17, 117:23-118:21	
119:15-18	MT	114:3-6, 114:18-24, 116:22-117:17, 117:23-118:21	
119:21-24		114:3-6, 114:18-24, 116:22-117:17, 117:23-118:21	
122:23-123:1	MT, 104a	122:6-22	
123:4-6	104a		
125:6-11	IH, 602, 104a		
125:14-17	IH, 602, 104a		
126:4-8	IH, 602, 104a	125:18-20, 126:1-3, 126:19-22, 126:25	
135:15-136:15			
142:25-143:8	IH, 602	136:20-137:15, 137:19-138:5, 138:9- 16, 138:24-139:2, 139:11-12, 140:8-15,	

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
		140:18-141:6, 141:13-25, 142:14-24	
143:16-144:2			
150:6-9			
159:10-160:8	IH, C, 602	159:7-9	
180:19-181:2	V		
181:12-24	V		

7. James Maccoun – 06/10/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
6:24-7:4			
9:1-3			
21:6-8		21:9-14, 53:17-56:11	Improper counter-designation (53:17-56:11)
33:2-10	LC, 104a		
48:22-49:3	IH, C		
49:6-16	IH, C		
49:22-50:13		51:9-21	
63:24-64:3		64:4-11	602
93:12-15			
93:17-19			
93:21-94:9	MT, AF		
94:12-25	IH, 602		
95:3-17	MT, AF		
144:10-18			
144:25-145:2		145:3-17, 146:5-15, 148:6-15	402, 403, 602
145:20-146:4	DI	145:18-19	
146:16-147:2			

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
148:16-19		148:6-15, 148:23-24, 149:1-3	402, 403, 602
148:22		148:6-15, 148:23-24, 149:1-3	402, 403, 602
149:12-20			
149:23-25		146:5-15, 148:23-24, 149:1-3	402, 403, 602
150:8-17			
165:23-166:6			
166:14-23			
167:13-18		168:1-4	402, 403
168:8-10		168:1-4	402, 403
168:15-18			
174:24-175:18			
176:1-16			
176:21-177:1			
177:10-16			
177:24-25			
178:3-9	MT, 403		
178:12-15	PRIV, 401/402, 403, MIL, V		
178:17-18	PRIV, 401/402, 403, MIL, V		

## 8. Nancy Miracle – 06/23/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
20:1-9			
111:8-14		111:15, 111:18-25	602, 701
156:8-9	104a, 106, 602, 701, 702	153:11-13, 153:24, 154:5-25	701
156:12-17	104a, 602, 701, 702	153:11-13, 153:24, 154:5-25	701

<b>Plaintiff's Designations</b>	<b>Defendants' Objections</b>	<b>Defendants' Counter Designations</b>	<b>Plaintiff's Objections</b>
156:19-157:1	104a, 602, 701, 702	153:11-13, 153:24, 154:5-25	701
157:4-11	104a, 602, 701, 702	153:11-13, 153:24, 154:5-25	701
172:15-173:19			
174:5-8		173:24-174:4	

9. William J. Muerer – 3/23/16

Defendants object to Plaintiff's designations of testimony of Mr. William J. Meurer, Mr. Gary Rosenberg, and Mr. Douglas Stern. Plaintiff failed to produce transcripts of these depositions to Defendants during discovery or at any time before serving its designations. Plaintiff's reliance on these transcripts is contrary to the Delaware court's Protective Order as well as the Court's order in this case to produce any relevant materials that a party intends to rely on from the prior litigation in discovery in this case. The untimely disclosure of these transcripts is highly prejudicial to Defendants. Defendants intend to move to exclude any use or reliance on these transcripts. If the Court denies Defendants' motion to exclude these transcripts, Defendants reserve the right to serve objections and counter designations to Plaintiff's designations from these transcripts.

<b>Plaintiff's Designations</b>	<b>Defendants' Objections</b>	<b>Defendants' Counter Designations</b>	<b>Plaintiff's Objections</b>
9:15-22			
11:7-16			
11:20-12:18			
13:19-14:6			
18:19-19:9			
19:16-21:7			
34:21-35:5			
36:8-22			
37:1-25			
46:21-47:14			
47:20-48:9			
48:20-49:22			
52:2-53:16			

10. Chase Norlin – 06/10/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
11:12-14			
58:18-59:17			
76:8-9			
78:1-4		77:14-20	
78:6-16		78:21-80:2	
90:15-23			
91:12-16		91:17-92:12	Improper counter-designation
96:4-20		96:21-98:9	
98:10-99:6			
101:15-102:4	IIOC	102:5-15	
102:16-103:18		109:7-12, 122:24-25, 132:9-13, 133:1-134:17	Improper counter-designation
104:25-105:7			
106:5-11		106:12-107:10	
110:19-25			
114:9-116:13		116:14-18	
141:3-8			
146:4-6		145:22-146:3, 154:19-21, 154:25-155:4, 155:8-10, 155:22-156:5	
148:21-150:17	MIL, IIOC, 602		
150:20-151:19	MIL, IIOC, 104a, MT		
153:3-154:1			

11. Lauren Pollak-Winkler – 06/18/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
6:25-7:3			

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
15:15-16:1		14:1-4, 15:6-14	
16:11-14			
17:16-18:5		17:9-15	
21:17-22	LC, 104a		
22:5-16	30(b)(6), IIOC, 104a		
22:18-23:3	30(b)(6), 104a		
24:11-18	30(b)(6), 104a		
25:20	30(b)(6), 104a		
25:22-23	30(b)(6), 104a		
30:1-4	30(b)(6), 104a		
31:16-22			
33:16-34:6			
34:24-35:4	30(b)(6), 104a, 401/402, 403		
35:14-36:3	30(b)(6), 104a		
36:13-37:7	MIL, 401/402, 403		
38:3-8	DI	38:9-11	
38:12-19			
39:1-3			
39:6-8			
48:3-12			
49:3-9			
49:17-23			
50:10-11	30(b)(6), 104a		
50:14	30(b)(6), 104a		
50:16-21	104a, V, 401/402, 403		
51:2-5	30(b)(6), 104a		
51:7-8	30(b)(6), 104a		
51:10-11	30(b)(6), 104a		
51:13-25	30(b)(6), 104a		

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
52:2	30(b)(6), 104a		
53:1-6			
53:22-54:1			
58:9-17	MIL, 401/402, 403		
61:15-18	30(b)(6), 104a		
61:20-22	30(b)(6), 104a		
63:6-12	30(b)(6), 104a		
63:14-15	30(b)(6), 104a		
63:17-18	30(b)(6), 104a		
63:20-23	30(b)(6), 104a		
64:11-13	104a, 602, 30(b)(6), IH		
64:16-23	104a, 602, 30(b)(6), IH, MIL		
65:10-11	30(b)(6), 104a, 401/402, 403		
65:13	30(b)(6), 104a, 401/402, 403		
65:21-66:5	401/402, 403, MIL		
66:18-21	401/402, 403, MIL	66:22-67:1; 126:11-127:5, 127:22-128:10	602
68:16-69:2	V, 401/402, 403, MIL		
69:4-7	401/402, 403, MIL		
70-1-7	401/402, 403, MIL		
70:13-18	401/402, 403, MIL		
72:24-73:15	401/402, 403, MIL		
73:24	30(b)(6), 104a		
74:1-5	30(b)(6), 104a		
74:7-10	30(b)(6), 104a		
74:12-15	30(b)(6), 104a		
74:17-18	30(b)(6), 104a		
74:20-22	30(b)(6), 104a		

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
75:5-16	30(b)(6), 104a		
75:22	30(b)(6), 104a		
75:24-25	30(b)(6), 104a		
76:11-77:4	MIL, 401/402, 403		
77:7-10	30(b)(6), 104a		
77:12	30(b)(6), 104a		
80:2-14	MIL, 401/402, 403, 602, 104a, 30(B)(6)		
80:16-17	MIL, 401/402, 043, 602, 104a, 30(B)(6)		
80:19-21	30(b)(6), 104a		
80:23-81:4	30(b)(6), 104a		
81:6	30(b)(6), 104a, 401/402, 403		
81:8-24			
82:15-18	30(b)(6), 104a	83:4-7	
84:1-8			
86:24-87:3		84:23-85:5	
89:1-16			
89:23-90:9			
90:24-91:2	104a, 30(B)(6), 602	90:19-23, 91:3-7, 123:2-18	602
91:13-21			
95:2-7		123:2-18	
95:15-23			
96:19-21	30(b)(6), 104a, 602		
96:23-97:5	30(b)(6) , 104a, 602		
97:23-99:8		99:14-24	
101:20-102:1		102:8-17	
102:18-24	30(b)(6), 104a, MIL, 401/402, 403, 602		
103:1-16			

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
104:14-23		104:24-105:20	
107:4-8			
113:1-14		113:15-24	
114:2-22			
116:13-117:6			
117:14-23		118:3-11; 126:11-127:5, 127:22-128:10	602
126:4-10			
128:24-129:4			
129:7-133:9	403 (133:1-7), AA	126:11-127:5, 127:22-128:10	602
133:12-19	30(b)(6)		
133:21-22	30(b)(6)	133:24-134:5	
134:6-20			
135:6-9	MT		
135:12-15			
135:17-18			
136:1-3		136:4-10	
136:11-20			
140:16-141:6			
143:19-24	30(b)(6), 104a		
144:1-3	30(b)(6), 104a		
144:11-16	30(b)(6), 104a		
146:24-150:4	DI, IIOC, 30(b)(6), 104a	146:21-23	402
151:17-153:15	MIL, 401/402, 403, ML, 30(b)(6), 104a		
153:18-19	MIL, 401/402, 403, ML, 30(b)(6), 104a	153:21-154:3, 154:5-10	602
156:8-14		156:15-18	
156:25-157:23		157:24-158:4	
163:22-164:4	104a, 30(b)(6), 602, V		

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
164:7-13	104a, 30(b)(6), 602		
164:16-17	104a, 30(b)(6), 602		
165:11-13		165:14-17	
165:18-166:7			
169:10-23			
174:13-16			
174:25-175:10			
175:25			
176:6-7		176:8-12	
177:20-178:4			
179:11-181:19			
182:24			
183:2-3			
183:23-185:8	IIOC	185:9-10	
185:11-17			
186:1-3			
186:8-15			
186:25-187:8			

12. Gary Rosenberg – 3/23/2016

Defendants object to Plaintiff's designations of testimony of Mr. William J. Meurer, Mr. Gary Rosenberg, and Mr. Douglas Stern. Plaintiff failed to produce transcripts of these depositions to Defendants during discovery or at any time before serving its designations. Plaintiff's reliance on these transcripts is contrary to the Delaware court's Protective Order as well as the Court's order in this case to produce any relevant materials that a party intends to rely on from the prior litigation in discovery in this case. The untimely disclosure of these transcripts is highly prejudicial to Defendants. Defendants intend to move to exclude any use or reliance on these transcripts. If the Court denies Defendants' motion to exclude these transcripts, Defendants reserve the right to serve objections and counter designations to Plaintiff's designations from these transcripts.

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
7:14-21			

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
14:3-7			
20:25-21:5			
21:15-23			
22:16-24			
23:4-24:1			
24:11-22			
25:23-26:8			
26:18-20			
28:14-29:14			
30:22-31:3			
31:17-25			
32:2-5			

13. Douglas Stern – 3/23/2016

Defendants object to Plaintiff's designations of testimony of Mr. William J. Meurer, Mr. Gary Rosenberg, and Mr. Douglas Stern. Plaintiff failed to produce transcripts of these depositions to Defendants during discovery or at any time before serving its designations. Plaintiff's reliance on these transcripts is contrary to the Delaware court's Protective Order as well as the Court's order in this case to produce any relevant materials that a party intends to rely on from the prior litigation in discovery in this case. The untimely disclosure of these transcripts is highly prejudicial to Defendants. Defendants intend to move to exclude any use or reliance on these transcripts. If the Court denies Defendants' motion to exclude these transcripts, Defendants reserve the right to serve objections and counter designations to Plaintiff's designations from these transcripts.

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
10:3-5			
13:20-14:4			
14:8-23			
16:17-22			
22:9-12			
22:19-23:1			
26:12-20			

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
26:23-27:25			
28:2-7			
29:19-30:16			
30:25-31:12			
42:2-22			
43:3-16			
47:7-20			
59:6-14			
60:5-61:19			

14. Daniel Stodolsky – 06/04/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
6:3-6			
20:22-21:13			
21:19-22:19			
25:24-26:7			
28:16-29:5			
29:16-18	30(b)(6), 104a, 602		
29:21-30:7	30(b)(6), 104a, 602		
32:7-9	30(b)(6), 104a, C, V		
32:11-18	30(b)(6), 104a, C, V		
32:21-33:1	30(b)(6), 104a, C, V		
33:4-11	30(b)(6), 104a, C, V, DI	33:13	
33:14-16	30(b)(6), 104a, C, V		
33:18	30(b)(6), 104a, C, V		
33:24-25	30(b)(6), 104a, 602		
34:3-4	30(b)(6), 104a, 602		
34:6-12	30(b)(6), 104a, 602		
34:15-18	30(b)(6), 104a, 602		

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
38:20-25	IUD		
39:17-19	IUD		
40:13-16			
40:19-21			
40:24-41:3			
42:20-43:3	30(b)(6), 602, 104a, 401/402, 403		
43:6-15	30(b)(6), 602, 104a, 401/402, 403		
43:18-19	30(b)(6), 602, 104a, 401/402, 403		
43:21		43:22-23, 43:25-44:2, 44:7-10, 44:16-21	602
45:9-10			
45:18-19			
45:21-25			
46:10-11	V		
46:13-19	401/402, 403, MIL, 30(b)(6), 104a		
46:22-25	401/402, 403, MIL, 30(b)(6), 104a		
47:3-5	401/402, 403, MIL, 602, 30(b)(6), 104a		
47:7-10	401/402, 403, MIL, 602, 30(b)(6), 104a		
47:12-15	401/402, 403, MIL, 602, 30(b)(6), 104a		
47:25-48:6		48:7-49:3	
49:19-21			
49:24-50:18	30(b)(6), 602, 104a	51:17-18, 51:21-22	
50:21-51:3	30(b)(6), 602, 104a	51:17-18, 51:21-22	
51:6-12	30(b)(6), 602, 104a	51:17-18, 51:21-22	
51:15-16	30(b)(6), 602, 104a	51:17-18, 51:21-22	

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
67:23-25	30(b)(6), 104a		
68:2-6	30(b)(6), 104a		
68:8-12	30(b)(6), 104a		
68:14-18	30(b)(6), 104a		
68:24-69:2		69:7-9, 69:11-16	
69:5-6		69:7-9, 69:11-16	
69:17-21	30(b)(6), 104a, DI	69:23	
69:24-70:1	30(b)(6), 104a, V		
70:4-5	30(b)(6), 104a, V		
78:18-20	30(b)(6), 104a, V		
78:22-79:2	30(b)(6), 104a, V, CD		
79:5-13	30(b)(6), 104a, CD		
79:15	30(b)(6), 104a, CD		
89:2-3	30(b)(6), 104a	88:9-12	
89:5-10	30(b)(6), 104a	89:11-14	
97:6-7	30(b)(6), 104a, V, 602	97:1-2, 97:4-5	602
97:10-14	30(b)(6), 104a, V, 602, IH	97:1-2, 97:4-5	602
97:17-23	30(b)(6), 104a, V, 602, IH		
98:1-9	30(b)(6), 104a, V, IH, 602		
98:12-16	30(b)(6), 104a, V, IH, 602		
100:2-5	104a, V, 30(b)(6), IH		
100:8-12	104a, V, 30(b)(6), IH		
106:6-7	30(b)(6), 104a, V, 602	106:20-23, 107:1-7	602
106:10-19	30(b)(6), 104a, V, 602	106:20-23, 107:1-7	602
107:14-16	30(b)(6), 104a, 602	106:20-23, 107:1-7, 107:21-24, 108:4	602
107:19-20	30(b)(6), 104a, 602	106:20-23, 107:1-7, 107:21-24, 108:4	602

15. Rachel Watters – 06/18/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
11:9-17			
12:8-14			
12:22-13:5			
14:17-15:2			
31:21-24			
32:6-22			
33:5-34:13		32:23-33:4	
35:5-8		35:9-19, 39:21-25, 36:7-9	Improper counter- designation (39:21-25)
36:21-37:4		36:10-14, 36:16-19	802

16. Charles Wieland – 07/15/21

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
11:16-18			
30:17-24			
31:3-5			
31:14-17			
31:22-24			
40:21-24			
45:23-46:5		42:10-12, 42:16-18	
46:21-23		46:14-15, 46:17-19	
46:25-47:3		46:14-15, 46:17-19	
75:3-76:4			
79:22-80:1			
83:11			
84:21-85:6			
85:9-25			

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
99:12-16			
138:1-4	IIOC		
138:9-18			
139:1-4			
139:7-13			
144:11-14			
146:13-147:3			
147:11-25	IIOC, DI		
150:3-14			
153:11-15			
153:18-154:1			
154:3-14	IIOC		
155:5-17	IIOC, NR, 602, 104a		
157:10-13			
157:19-22			
182:12-16			
182:19			
182:21-25			
183:3-9			
199:7			
202:3-5			
202:13-16			
204:13-15			
204:17-18	DI	204:19-21	
204:23-205:22	NR, 401/402, 403		
221:7-16			
224:18-225:9			
225:17-226:8			
226:13-227:5	104a, 602, NR		
227:9-12	104a, 602, NR		

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
227:14-18	104a, 602, NR		
227:20-23	104a, 602, NR		
227:25-228:19	104a, 602, NR		
231:5-9			
231:12-15			
231:17-23			
232:1-3			
233:23-25			
234:3-6			
235:10-15		235:25-236:1, 236:14-16, 259:9-12, 259:23-24, 260:1-4, 260:9-10	402, 403, No Answer Designated (235:25-236:1, 259:9-12, 259:23-24)
242:24-25	PO, ML	235:25-236:1, 236:14-16, 259:9-12, 259:23-24, 260:1-4, 260:9-10	402, 403, No Answer Designated (235:25-236:1, 259:9-12, 259:23-24)
243:2-11	PO, ML	235:25-236:1, 236:14-16, 259:9-12, 259:23-24, 260:1-4, 260:9-10	402, 403, No Answer Designated (235:25-236:1, 259:9-12, 259:23-24)
244:4-245:10	104a, 602, NR		
245:12-25	104a, 602, NR		
249:22-250:6	ML, DI	250:7-12	
250:13-21			
253:5-8	DI	253:9-18	
253:19-254:7		254:8-11	
258:3-10			
258:18-20	PO, ML, NR	235:25-236:1, 236:14-16, 259:9-12, 259:23-24, 260:1-4, 260:9-10	402, 403, No Answer Designated (235:25-236:1, 259:9-12, 259:23-24)

Plaintiff's Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections
259:6-7	PO, ML, NR	235:25-236:1, 236:14-16, 259:9-12, 259:23-24, 260:1-4, 260:9-10	402, 403, No Answer Designated (235:25-236:1, 259:9-12, 259:23-24)

Dated: October 6, 2021

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